



September 10, 2020

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Alexandra Dunn  
Assistant Administrator  
Office of Chemical Safety and Pollution Prevention  
Environmental Protection Agency

Via Email: [ [HYPERLINK "mailto:dunn.alexandra@epa.gov"](mailto:dunn.alexandra@epa.gov) ]

Dear Ms. Dunn,

I have been asked by several of our farmer customers to help them understand the government's position on the registration of low volatility dicamba products for use in crop to control weeds that are otherwise quite difficult to control. Many of our customers have enjoyed the benefit of this system and want to see it remain available. It is my understanding that this decision may not be taken until late this fall. I am writing to encourage approval of a new label for over the top application of dicamba for soybeans.

Our customers are now starting to make decisions for Spring 2021. As a seed company we must start making conditioning/packaging decisions this month as well. The longer the delay in hearing what the future holds, the more challenging it will be for us to be able to support our customers in the way they expect. The uncertainty of knowing what herbicide solutions may be available to our customers will put a major strain on the entire supply chain process and leaves our customers in a difficult position as they need to make purchase decisions.

I believe the current label restrictions were set based on a solid process and met the concerns of all stakeholders. We have had significant success with our customers on safely using this product and system to produce their soybean crop. We again encourage support of renewing the over the top label and hope that decision can be taken soon.

I appreciate your consideration of this important decision.

Sincerely,

A handwritten signature in black ink that reads 'Craig Anderson'.

Craig Anderson  
Chief Operating Officer